The OIPC's Privacy Management Program

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The OIPC launched its Privacy Management Program (PMP) Guidance in March 2018. Since that time, we have been busy working on our own PMP.

The Commissioner, Donovan Molloy, is the OIPC's Chief Privacy Officer. He has designated the day-to-day responsibilities for this role to one of the Access and Privacy Analysts. To both communicate this news and demonstrate senior executive support for the program, Commissioner Molloy sent an e-mail to all staff regarding the program and the above decisions. Discussion also occurs during weekly Analysts meetings.

The Commissioner receives updates on the Privacy Management during meetings of the Advocacy and Compliance Division. If an issue arises that needs attention or reflects a gap in compliance, the Analyst will update the Commissioner as required. Those meetings shall include Identifying the need for messages for communication to all staff, along with the most effective communication method to use.

Work is underway to develop a compliance reporting mechanism. Once finalized, we plan to release a template that others will be able to leverage for their own programs. While we will continue to use the Privacy Maturity Model developed by the American Institute of Certified Public Accountants (AICPA) and the Canadian Institute of Chartered Accountants (CICA), we prefer a mechanism that directly reflects the Privacy Management Program guidance piece.

As other jurisdictions have already published compliance reporting mechanisms, we are leveraging existing resources. Some examples include:

- [Privacy Management Program Gap Analysis](#) from OIPC Nova Scotia.
- [Privacy Management Program – A Practical Checklist for Compliance](#) from the Interactive Advertising Bureau of Canada.
- [Privacy Management Program Self Evaluation Tool](#) from Yukon Information and Privacy Commissioner.
- [Privacy Management Plan Template (for organizations)](#) from the Office of the Australian Information Commissioner.

In starting our PMP, we are focusing on staff training. While the OIPC offers training and provides guidance documents to public bodies under the *ATIPPA, 2015* and custodians under *PHIA*, it also provides a supportive professional development program for staff. While we recorded professional development through such means as conference registrations and documentation of continuing education requirements for maintaining professional certifications, there was no central location for all records.

With input from all staff, we developed and launched, as a pilot, a training tracker and affiliated procedures. We will review this initiative in December, providing time to make any necessary adjustments before the formal launch in January 2019.

Stay tuned for an update on this initiative in future blog posts.

If you have done work on your Privacy Management Program and have resources to share, please reach out to our Office. We would love to hear from you!